

Production	File Name	Date	Title	Description & Enclosures Listed	Enclosures Produced
6/20/14 Prod. (DVD 15)	100_declass	12/18/12	Document procedure and results for lab testing of seed by BioDiagnostics, Inc. on 11/15/2012.	1. (U) Betzel and Blackstad Emails to SA Better; 2. (U) Isozyme spreadsheet ("FBI-Omaha Division Isozyme Electrophoresis Genotype Report Samples 1014703-1014721_1014894-1014895_11-26-12.xlsx") attached to Betzel's 11/26/12 email; 3. (U) Excel spreadsheet ("FBI 112112 Data Summary.xlsx") Data Summary attached to Blackstad's 11/27/12 email; 4. (U) Excel spreadsheet ("FBI sample comparison to KS-1 and KS-2.xlsx") FBI sample comparison attached to Blackstad's 11/27/12 email; 5. (U) PDF Dendogram and PCA by Sample attachment ("FBI Dendogram and PCA by sample.pdf") to Blackstad's 11/27/12 email.	None.
6/20/14 Prod. (DVD 15)	307_declass	12/20/13	Search warrants for Mo's property.	1. 7777 Glades warrant and seal order; 2. 22130 Candle warrant and seal order.	None.
6/20/14 Prod. (DVD 15)	320_declass	1/30/14	Review of items seized from the search warrants conducted on Mo Hallong's property.	1. Translation of Mo's documents; 2. Summary list of evidentiary documents; 3. Evidence items 182, 183, 184, 185, 186, 1822, 1823, 1B24, and 1B25	Received the summary list of evidentiary documents seized from search of Mo's property. DOJ did not produce the translation of Mo's documents or the physical evidence listed.
6/20/14 Prod. (DVD 15)	375_declass	10/9/13	Search of Crowne Plaza room.	1. airline bag tag; 2. bag tag; 3. handwritten note; 4. receipt; 5. receipts / paper in room.	None.
6/20/14 Prod. (DVD 15)	425_declass	9/7/12	Enterprise rental car history for Wang Hong-Wei from 05/05/2010 - 09/30/2012.	Excel Spreadsheet with Enterprise Rentals by Wang Hong-Wei.	None.
6/20/14 Prod. (DVD 15)	464_declass	12/13/13	Dropbox.com Preservation Letter.	Dropbox Preservation of Records Request for DBN.	None.
6/20/14 Prod. (DVD 15)	465_declass	12/13/13	Embassy of China Notification.	Notification of Arrest of Mo Hallong.	None.
6/20/14 Prod. (DVD 15)	495_declass	3/14/14	302: FBI Interview of Brian R. Schubbe conducted in person in Peotone, Illinois.	"Schubbe provided a sheet of paper with a copy of all three checks from 2013 to the case agents; which has been included in a physical 1A in the case file."	None.
6/20/14 Prod. (DVD 15)	517_declass	7/12/12	1A entries from MST coverage and aerial photos.	1. 06/05/2012 Aerial Photo CD; 2. 06/14/2012 Aerial Photo CD; 3. MUDDY HOOVES notes from 5/20/2012; 4. MUDDY HOOVES original copy of photos from 05/20/2012; 5. Original Surveillance photos of MUDDY HOOVES, 05/20/2012; 6. Photos of unsubs fishing with MUDDY HOOVES, 05/20/2012; 7. DVD copy of pictures with MUDDY HOOVES and unsubs fishing, 05/20/2012; 8. Original photos of MUDDY HOOVES and unsubs fishing. (DVD), 05/20/2012.	The aerial photo CDs were produced. Other enclosures have not been produced.
6/20/14 Prod. (DVD 15)	serial50_declass	10/3/12	302: FBI Interview of Leonard Young conducted in person in New Lenox, Illinois.	"Downloaded recording entered into evidence as 1D1."	None.
6/20/14 Prod. (DVD 15)	serial67_declass	10/1/12	9/30/12 Surveillance.	1. (U) DVD with the photos from Wang's camera; 2. (U) Report from Dana Brown; 3. (U) pocket litter of Wang; 4. (U) Copy of note book; 5. (U) Second half of note book; 6. (U) Cellular telephone information; 7. (U) Cellular telephone information; 8. (U) Cellular telephone information; 9. (U) Copy of Wang's iPad.	DVD with photos from Wang's camera were produced. The Dana Report, pocket litter of Wang, copy of note book, second half of note book, and two cellular telephone records were produced. We are still missing a third copy of cellular records and copy of Wang's iPad.
6/20/14 Prod. (DVD 15)	303_declass	12/11/13	302: FBI Interview of Gang Wan conducted in person in Johnston, Iowa.	o Photo array shown to Gang Wan. o Gang Wan's writing of company name in Chinese.	None.
6/20/14 Prod. (DVD 15 & 16)	serial50_declass; U_Telephonic Interview_o	9/27/12 9/25/12	302: FBI Interview of Leonard Young.	o FD-472 that Leonard Young signed and entered into during interview. o Audio recording that was entered into evidence.	None.

EXHIBIT

Tables

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Production	File Name	Date	Title	Description & Enclosures Listed	Enclosures produced
6/20/14 Prod. (DVD 16)	Li Shaoming and Ye Jian's CBP-detained bags Memo	9/30/12	302: FBI Search Memo for Li Shaoming and Ye Jian's CBP-detained bags from 09/30/2012.	<ul style="list-style-type: none"> o 30 Subway napkins that contained corn seeds detained from Ye Jian's checked luggage. o Other corn seeds detained from Ye Jian's person. o "[A]pproximately two popcorn boxes that contained multiple key sized envelopes with corn seeds in each envelope that were found in Li's checked luggage." o Multiple key sized envelopes that contained corn seeds from Li Shaoming's checked luggage. o Corn seeds from the key sized envelopes from Li Shaoming's checked luggage. o "[A]pproximately twelve brown paper bags that contained multiple key sized envelopes with corn seeds in each envelope." The brown paper bags were located in Li Shaoming's checked luggage. o Multiple key sized envelopes that contained corn seeds found in Li Shaoming's checked luggage. o Corn seeds found in multiple key sized envelopes from Li Shaoming's checked luggage. o Corn seeds found on Li Shaoming's person. 	None.
6/20/14 Prod. (DVD 16)	287_declass	12/12/13	302: FBI Search Warrant Executed on 12/11/2013 at Storage Locker #48 at AM Mini Mart Self Storage in Adel, Iowa.	<ul style="list-style-type: none"> a) FD-597 Receipt for Evidence seized; b) copy of the filed Search Warrant (Issued 12/10/2013); c) photographs taken by special agent Justin McNair. 	None.
6/20/14 Prod. (DVD 16)	295_declass	12/17/13	302: FBI Search Warrant Executed on 12/11/2013 at Mo Hailong's Florida residence.	<p><u>General Evidence Seized:</u></p> <ul style="list-style-type: none"> a) enclosed sketch for location reference; 1-3) Box 1-3 Financial, Tax and Scientific Documentation From Room C; 4) Financial Documents, Scientific Documentation; 5) Seed Samples. <p><u>CART Evidence Seized:</u></p> <ul style="list-style-type: none"> b) enclosed sketch for location reference; 1) Lenovo ThinkPad s/n: R9-WHGXU Room B-desk; 2) iPhone model A1429 IMEI: 990002719060723 Room B desk with charger; 3) SanDisk Cruzer micro 2GB USB drive and Ativa 4GB USB drive Room B-bag on desk; 4) Sony 4GB USB thumb drive Area 1; 5) Lenovo B570 s/n: WB03500130 with charger Area 1; 6) 2GB USB thumb drive labeled CHANTLAND Room C-desk; 7) IBM ThinkPad s/n: L3-CCN27 Room C; 8) Lenovo All-In-One Config # 57311582, s/n: V80030015 with power supply Area C; 9) External USB hard drive model HD-D2-U2 Room C with power cord; 10) Hitachi 80 GB hard drive model HD5728080PLA380, s/n: PFDBU0SYU82P3X Room C; 11) Hitachi hard drive 320 GB, HTS725032A9A362 s/n: 100601PCK304VKJV049J Room B-desk; 12) Garmin Nuvi 350 s/n: 107250045 with charger Room B-desk with 2GB SanDisk SD card; 13) Nokia cell phone model 1616-2C IMEI: 012569/00/3773664/OW/SIMCARD Room B-desk; 14) K-Touch cell phone model B618 s/n: 2619151025422732 with 2GB micro SD card and SIM card Room B-desk; 	CART device no. 9 ("External USB hard drive model") not included on EnCase Image log.
6/20/14 Prod. (DVD 16)	310_declass	12/23/13	302: FBI Search Warrant Return issued for Locker 48 at AM Mini Self-Storage in Adel, Iowa.	"the attached search warrant return issued for locker 48 at AM Mini Self Storage located at 420 Nile Kinnick North, Adel, Iowa on 12/11/2013."	None.
6/20/14 Prod. (DVD 16)	315_declass	1/14/14	302: FBI Interview of Deng Lang conducted in person at the offices of Pioneer Inc., in Johnston, Iowa.	"Deng wrote the Chinese caricature of the company name on the author's notepad." o List of photographs numbered 1-8 o Photocopy of email between Zhao Ujian and Lang Deng dated 6/13/2011"	None.
6/20/14 Prod. (DVD 16)	384_declass	11/30/12	302: FBI Search of Ye Jian's Prairie Meadows Hotel and Casino hotel room in Altoona, Iowa.	"A copy of the guest registrar for rooms 314 and 312 is attached hereto."	None.

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6/20/14 Prod. (DVD 16)	452_declass	1/21/14	302: FBI Photographic Support during the execution of a search warrant at Mo Hallong's Florida residence.	"Disks containing digital images, contact sheets, and a photographic log are attached to this FD-302 as a 1A package."	None.
6/20/14 Prod. (DVD 16)	Interview of Helen Adams	10/7/11	302: FBI Interview of Helen C. Adams conducted in Johnston, Iowa.	"a copy of the document which was provided to the Pioneer personnel during the interview concerning the applicable statutes has been enclosed in the OM-S4106 case file in a 1A envelope with interview notes."	None.
6/20/14 Prod. (DVD 16)	Interview of Kathleen Walz	5/7/12	302: FBI Interview of C. Kathleen Walz conducted in Manhattan, Illinois.	"the photograph shown to (K)Walz, as well as a copy of the Pioneer seed catalog provided to Robert and the unknown Asian male, have been placed to a 1A envelope."	None.
6/20/14 Prod. (DVD 16)	U_Photos_and_sketch	1/15/14	302: FBI Search Warrant Photographer and Sketch for in person search in Boca Raton, Florida.	"An original CD containing the photographs take, photographic log, and sketch have been placed in a 1A and are attached to this document."	CD containing photographs not produced.
6/20/14 Prod. (DVD 16)	Gmail Acct RobertMo@Gmail.com.pdf	2/12/12	Google Certificate of Authenticity regarding CD of data pertaining to the account RobertMo@gmail.com.	Response to court order.	Court Order and CD not included.
6/20/14 Prod. (DVD 16)	Pattonsburg MO report - 55.pdf	5/2/12	Information from MFA Agri Services in Pattonsburg, Missouri regarding purchases by Mo Hallong.	File mentions the following enclosures: 3 invoices; 1 inventory sheet from Bethany MFA; 1 2011 Monsanto Agreement; Various product sheets; 1 2012 Seed Resource Guide; 1 Business card for Whitney Mason; and 1 Business card for Aaron Mason.	Documents not included.
6/20/14 Prod. (DVD 16)	302_declass	12/11/13	302: FBI Interview of Welfang Lai conducted in person in Des Moines, Iowa.	o Photo spread shown to Welfang Lai. o Emails dated January 2, 2013 between Lai Welfang and Wu Yangzhong.	None.
6/20/14 Prod. (DVD 16)	Interview of Wayne Walz (5/7/12 & 5/29/12)	5/7/12 5/29/12	302: FBI Interview of Wayne Walz at his home; 302: FBI Interview of Wayne and Candy Walz conducted in Manhattan, Illinois.	o Photograph shown to Walz. o Pictures of Kevin Montgomery and Eugene Yu shown to Wayne and Candy Walz.	None.
6/20/14 Prod. (DVD 16)	serial92_declass serial95_declass	11/19/12	302: FBI Drove to Various Cities in Illinois.	Report concerning interview with Jon Calease (Monsanto) referenced in FD-302s.	None.
6/20/14 Prod. (DVD 16)	U_Interview_of_Joel_Thom.ofd	12/12/13	302: FBI Interview of Joel Thomas.	o Photographs shown to Thomas of Robert Mo, U Shaoming, and others.	None.
7/3/14 Prod.	01 U_Telephone_call with Michael QuicK 582 redacted.pdf	5/1/14	302: FBI Interview of Michael QuicK	QuicK and his wife were shown a picture of Mo Hallong and Zhao Lujuan.	DOJ did not produce pictures used and/or attached to QuicK interview.
7/3/14 Prod.	U_Interview of Jennifer Johnson	5/29/14	302: FBI Interview of Jennifer Johnson conducted in Des Moines, Iowa.	Patent IDs for P208BHR and P065AM1.	None.
7/3/14 Prod.	Inventory Memo for Wang Hongwei's Canadian seizure	5/9/14	302: FBI Inventory Re Envelopes of Corn Seized from Wang Hongwei.	o Spreadsheet identifying the marking on each envelope is attached.	None.
7/31/14 Prod.	U_U.S._Customs_and_Border.pdf	7/1/14	FBI report of the USCBP's Inspection of Mo Yun's luggage on 7/1/2014	Follow-up report of USCBP and FBI's interview with Mo Yun on 7/1/14, while her luggage was being inspected; CD of photos taken by SA Kevin Hogg of Mo Yun's luggage at Los Angeles International Airport (LAX), on 7/1/14, which was reportedly placed in a 1-A envelope.	CD of photos reportedly placed in 1-A envelope not included.
7/31/14 Prod.	U_CBP_Detainer_Details_f.pdf	7/1/14	Immigration Detainer - Notice of Action for Mo Yun dated 7/1/2014.	FBI-302 attaching DHS Form I-24 "Immigration Detainer - Notice of Action" for Mo Yun	Pages 2 and 3 from DHS Form I-24 "Immigration Detainer - Notice of Action" for Mo Yun not included.
8/28/14 Prod.	U_DONG_Zhanshan_UNCLASS.pdf	12/11/13	Dong Zhanshan Interview.	"[P]hoto array of different individuals of interest to the Federal Bureau of Investigation (FBI)"; Copy of Dong Zhanshan's Driver's License.	None.
8/28/14 Prod.	_1770153733DBNSEARCH_2013_12_13_10_19_13_791_1.pdf	12/11/13	Search of DBN Offices in Boca Raton, FL on 12/11/2013.	Original photographs, FD-597s, Search Sign-in Log and Evidence Recovery Logs	Search and Seizure Warrant for DBN's Boca Raton, FL offices; crime scene sign-in log; two evidence recovery logs with items noted; and two FD-597 receipts for property seized with items noted.
8/28/14 Prod.	U_Unclassified_report_of.pdf	2/4/14	Robert Dean Norman Interview.	Photographs of Mo Hallong; R.D. Norman's 2008 U.S. Income Tax Return.	Original photographs are missing. None.

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8/28/14 Prod.	1202186437Evidence_items_discovered_from_MO_s_documents_2014_01_28_15_54_33_571.pdf	12/11/13	1A71 Summary of physical items from MO search (home and DBN), on 12/11/2013.	This document purports to summarize physical items seized during the search of Mo Hallong's home and DBN's offices. It lists: o contents of MO's travel folders for 2008, 2009, and 2010; o two unmarked folders; o a bills folder; o a BoA folder; o a Silvita folder; o a DBN folder for 2012; o a Sasquatch sighting and paperwork documenting folders; o a summary of Item 3, Box 3, from MO's evidence log (i.e., Financial, Tax and Scientific Documentation from Room C).	We do not have copies of the physical evidence. The document also does not include all physical evidence seized at Mo Hallong's home and/or DBN's offices on 12/11/2013, as listed in other documents, including Serial 295 (Search Warrant for Mo Hallong's Florida Residence) and Serial 643 (Search Warrant for DBN offices).
9/9/14 Prod.	1A10_Homestead Suites Receipt_attachment to serial 11.pdf	8/25/12	Ye Jian's receipt for the Homestead Studio Suites Chicago/ Westmont arriving 8/18/2012 and departing 8/26/2012.		Note: Serial 11 has not been produced.
9/9/14 Prod.	1A10_Photo of YE Jian Inside Walmart_attachment to serial 11.JPG	None.	Photograph of Ye Jian Inside a Walmart.		Note: Serial 11 has not been produced.
9/9/14 Prod.	_1728683763OM_2524193_Serial_176_declass.docx	6/15/12	Documenting the travel of Mo Hallong at O'Hare on 6/13/2012.	Copies of travel documents (redacted) obtained by USCBP at ORD, Chicago, Illinois.	None.
9/9/14 Prod.	_172868753354446_serial_387_declass.pdf	9/30/12	1057: Outbound screening of Ye Jian and Li Shaoming. <u>Li Shaoming:</u> Business card for DBN; two popcorn boxes with numerous key envelopes that contained seeds; numerous brown paper bags marked with numbers also containing key envelops with seeds. <u>Ye Jian:</u> Business card for Trong Tim Limited Company; 30 Subway napkins containing seeds.		None.
9/9/14 Prod.	_172868845854425_serial_8_declass.docx	5/15/12	Outbound interviews of Lin Yong and Ye Jian at Seatac Airport in Seattle, Washington.	"Photocopies of all relevant business cards and written material will be submitted under separate cover. Seattle considers this lead covered."	None.
9/9/14 Prod.	Serial 647_MO YUN Customs Decl.pdf	8/11/14	1036: Mo Yun's customs declaration.	Original customs declaration completed by Mo Yun on 6/25/2014 upon entry at LAX airport.	None.
9/9/14 Prod.	Serial 655 Pole Cam Review 08172012 to 12142012.pdf	8/17/12	302: Federal Grand Jury Material - Disseminate Pursuant to Rule 6 (E).	"Pursuant to a court order, a camera was installed..."	Missing: Court order allowing the camera to be installed.
9/9/14 Prod.	Serial 660_MO Hallong using SKYPE at Polk County Jail.pdf	8/25/14	302: Mo Hallong using SKYPE at Polk County Jail.	Photos taken from Mo Yun's iPhone of Mo Hallong using SKYPE at the Polk County Jail.	None.
9/9/14 Prod.	serial_652_MO YUN IPHONE EXAM REPORT.pdf	8/6/14	Mo Yun iPhone exam report.	1. Lexar 3.0 USB 16 GB Drive; 2. Verbatim red color USB jumpdrive; 3. 25 GB blue-ray disk containing three extracted reports labeled DEOMB; 4. Notes of the examination.	Extraction report and Lantern Forensic Report were produced. Other enclosures were not.
9/9/14 Prod.	Serial_653_Procedure to review MO Yun iPhone data.pdf	8/11/14	302: Procedure to review Mo Yun's iPhone data.	Translations of pertinent materials.	None.
9/9/14 Prod.	Serial 656_CBP Authority to Release Reports/ attachments	6/13/12	CBP Secondary Inspection Reports for Mo Hallong, Li Shaoming, and Ye Jian.	During exam of Li Shaoming's checked-in luggage, the CBP discovered seeds, which were detained and "TTO TO FBI. SEE IOIL #2012390101147." The seeds were placed in evidence bag #X006769 and receipted on 6051D #0125711.	None.
				During exam of Ye Jian's checked-in luggage, the CBP discovered seeds, which were detained and "TTO TO FBI. SEE IOIL #2012390101146." The seeds were placed in evidence bags #G016503/AL0869492 and receipted on CBP form 6051D #356647.	

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9/9/14 Prod.	DOJ Production Letter	9/9/14			DOJ failed to produce: o USAO Bate 879 – (U) Original surveillance log of Hallong Mo on 10/23/12. o USAO Bate 1478 – Blank. o USAO Bate 1479 – Surveillance video of YeJian on 11/29/12. o USAO Bate 59 – (U) Surveillance conducted of Mo Hallong. o USAO Bate 394 – (U) To report results of investigation and to report lead covered. o USAO Bate 1066 – (U) TO DOCUMENT RESULTS OF PHYSICAL SURVEILLANCE o USAO Bate 1080 – (U) TO DOCUMENT THE ATTACHMENT OF SLAP ON TRACKING
6.20.2014 DVD 16	Wells Fargo Home Mortgage 1A16.pdf	9/6/12	Wells Fargo Home Mortgage response regarding Robert Mo.	Response to "Correspondence/Subpoena request."	Correspondence/Subpoena not included.
7.31.2014 Production	U_FGI_Subpoena_2014_044_.pdf	7/23/14	FGI Subpoena 2014-044	Subpoena issued to Yahoo on 6/27/14 for account information for moyun6@yahoo.com.cn. Attached documents reflect it was established on 12/20/01, and that an alternate email address is listed as moyun6@163.com. IP connection logs reflected in attached spreadsheet show connection activity between 7/12/13 - 6/19/14.	Grand Jury Subpoena not included. img-721121118-0001.pdf listed in email from Yahoo not included.
6.20.2014 DVD 16	Citibank records for Kings Nower 1A18.pdf	6/19/12	Citibank Records Check and Account statements from 12/09/2011 to 05/31/2012 for Kings Nower North America.	Response to letter dated 05/31/2012.	Letter dated 5/31/2012 not included.
6.20.2014 DVD 16	Citibank records for Kings Nower 1A13.pdf	7/23/12	Citibank Business Deposit Account Application from 12/10/2011 for Kings Nower North America.	Response to letter dated 5/31/2012.	Letter dated 5/31/2012 not included.
6.20.2014 DVD 16	Gmail Acct RobertMo@Gmail.com.pdf	2/12/12	Google Certificate of Authenticity regarding CD of data pertaining to the account RobertMo@gmail.com.	Response to court order.	Court Order and CD not included.
6.20.2014 DVD 16	Heartland Coop Records 1A14.pdf	7/31/12	Heartland Co-op Grain Settlements and Address Change for Customer Mo Hallong.	Response to letter dated 5/31/2012.	Letter not included.
6.20.2014 DVD 16	Heartland Coop Records 1A15.pdf	9/5/12	Heartland Co-op Grain Settlements for Customer Mo Hallong.	Response to letter dated 8/8/2012.	Letter not included.